

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

RENAY LYNCH,

Plaintiff,

v.

Case No. 1:25-cv-00075-LJV

THE TOWN OF AMHERST, MICHAEL J. MELTON,
JOSEPH LaCORTE, RAYMOND KLIMCZAK and THE
COUNTY OF ERIE,

Defendants.

**COUNTY OF ERIE'S NOTICE OF MOTION
IN SUPPORT OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated April 17, 2025, Defendant County of Erie (the "County"), by and through its attorneys, Lippes Mathias LLP, hereby moves, pursuant to Federal Rules of Civil Procedure 12(b)(6), to dismiss all claims asserted against it in their entirety, together with any such other and further relief the Court deems just and proper. Pursuant to Local Rule 7(a)(1), the County intends to file reply papers.

Dated: Buffalo, New York
April 17, 2025

LIPPES MATHIAS LLP

s/Kirstie A. Means

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